



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

September 4, 2007

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

Keith Bentley  
Vice President of Environmental Affairs  
Georgia Pacific Corporation  
133 Peachtree St., N.E.  
Atlanta, GA 30303

Re: Clean Air Act Reporting Requirement, Docket No. AAA-07-0030

Dear Mr. Bentley:

The United States Environmental Protection Agency ("EPA") issues this reporting requirement to Georgia Pacific Corporation ("GP") under Section 114(a)(1) of the Clean Air Act ("CAA" or "Act"), 42 U.S.C. § 7414(a). This reporting requirement orders GP to submit information to EPA relating to compliance with the CAA and with the National Emission Standard for Hazardous Air Pollutants for the Pulp and Paper Industry, 40 C.F.R. Part 63, Subpart S ("Pulp and Paper NESHAP") at the facility formerly owned by GP in Old Town, Maine.

Until October 2006, Fort James Operating Company ("FJ"), a subsidiary of GP, owned and operated a pulp and paper mill in Old Town, Maine, known as the Old Town Mill (the "Mill" or "facility"). The Maine Department of Environmental Protection issued Air Emission License #1782 for the facility on June 11, 1980. The license has been amended numerous times since that date. In March 2006, GP/FJ shut down the Mill.

Pursuant to Section 114(a)(1) of the Clean Air Act, EPA has the authority to require any person who owns or operates any emission source to provide such information as EPA may reasonably require in carrying out any provisions of the Act. Accordingly, within forty-five (45) days of receipt of this reporting requirement, GP is hereby required to provide the information and documents described below. Submit a separate numbered response to each numbered paragraph or subparagraph below. In addition to providing hard copies, provide the information in an electronic spreadsheet where feasible.

1. All documents relating to baseline emissions testing of equipment under 40 C.F.R. §63.447(d) of the Pulp and Paper NESHAP that occurred during the period from April 15, 1999 to March 1, 2006 ("the reporting period"), including but not limited to:
  - a. the full test reports from the March and May 2005 emissions testing;
  - b. the pulping condensate sampling plan used during testing; and
  - c. the pulping condensate methanol calculations made before and after testing; and

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- d. all information (modeling inputs and outputs) relating to Model 9 results performed on the waste water treatment system.
2. Calculations of the total facility air pollution emissions and air emission license fees for 2005 through the date of the facility's closure.
3. All documents related to the control of emissions under the Pulp and Paper NESHAP from the affected equipment systems described at 40 C.F.R. §§ 63.443(a)(1)(ii) through (a)(1)(v), including:
  - a. the strategy for controlling HAP emissions for each affected equipment system, such as the information contained in the control strategy reports required under 40 C.F.R. §63.455(b);
  - b. the location of control equipment for each of the affected equipment systems;
  - c. the date of installation of control equipment, including the date that the installation was started and completed, for each of the affected equipment systems;
  - d. the cost of control equipment for each of the affected equipment systems; and
  - e. the intended location and estimated costs of any pollution control equipment that was planned but never installed for each of the affected equipment systems.
4. The most recent start up, shut down, malfunction (SSM) plan required by 40 CFR §63.6(e)(3), and copies of all records and reports of SSM incidents during the reporting period.
5. All documents, including the facility's sampling plan, related to leak detection and repair required under 40 C.F.R. § 63.453(k)(3) and performed at the facility during the reporting period.
6. All ambient air quality dispersion modeling documents created during the reporting period for the recovery furnace, including meteorological data used in the ambient air quality dispersion modeling.
7. All data and emissions calculations used to prepare the Title V permit application for the Mill.
8. All documents describing the waste water treatment system as it existed during the reporting period, including diagrams describing proposed or actual changes to comply with the Pulp and Paper NESHAP.

Be aware that if GP does not provide the requested information, EPA may order GP to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork

Reduction Act.

GP may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to GP. Please be aware that the State of Maine may have different rules and regulations governing the protection of confidential business information.

You are required to submit the above-required information to:

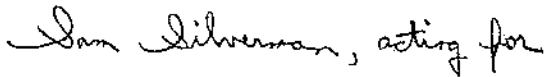
Susan Studlien, Director  
Office of Environmental Stewardship (Mail Code: SAA)  
U.S. Environmental Protection Agency, Region I  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023  
Attn: Thomas McCusker, Air Technical Unit

EPA requests that you provide a copy of your response to:

James Brooks, Director  
Bureau of Air Quality  
Maine Department of Environmental Protection  
State House, Station 17  
Augusta, ME 04333

If you have any questions about this reporting requirement, please contact Thomas McCusker, Environmental Engineer, at (617) 918-1862, or have legal counsel contact Thomas T. Olivier, Senior Enforcement Counsel, at (617) 918-1737, within seven days of receipt of this document.

Sincerely,

A handwritten signature in cursive script that reads "Sam Silverman, acting for".

Susan Studlien, Director  
Office of Environmental Stewardship

cc: James Brooks, Maine DEP  
Bryce Sproul, Maine DEP